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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

IN RE:

Christina Lee Adkins

Debtor(s)

CASE NO. 22-41943-mxm  
CHAPTER 13

BRIDGE TOWER PROPERTIES, LLC

Movant

vs.

Christina Lee Adkins

Debtor(s)

Hearing date: November 22, 2022  
Hearing time: 9:30 AM

**RESPONDENT/DEBTOR'S AFFIDAVIT**

STATE OF TEXAS

COUNTY OF TARRANT

KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day personally appeared Christina Lee Adkins, who after being by me duly sworn and upon oath stated that she is over eighteen (18) years of age, of sound mind, and is qualified and competent in all respects to make this affidavit and does so of her own personal knowledge, and she further stated that the following statements are true and correct and based upon her personal knowledge:

1. Debtor, Christina Lee Adkins, filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code in Case Number 22-41943-mxm on or about August 25, 2022.
2. On or about October 28, 2022, Movant BRIDGE TOWER PROPERTIES, LLC (hereinafter "Movant") filed a Motion for Relief From Stay seeking a lift of the automatic stay insofar as the property described in the Motion for Relief From Stay.
3. Debtor is an occupant of the described rental property.
4. Debtor has in full force and effect an insurance policy on the described rental property.
5. Movant has indicated that Debtor was delinquent in post petition payments at the time their attorney filed this Motion to Lift Stay. Debtor is seeking a repayment plan of the post petition payments due for October and November, and believes she will be able to pay the December 1, 2022 monthly rent timely.
6. Debtor will resume direct monthly payments to Movant beginning December 1, 2022.

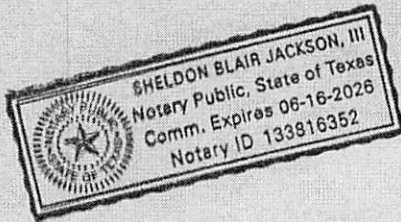
WHEREFORE, Debtor respectfully requests that this Court deny Movant's Motion to Lift Stay.

SIGNED this the 19 day of November, 2022.

/s/ Christina Adkins  
DEBTOR

SUBSCRIBED AND SWORN TO before me by the above-named Affiant on November 11, 2022, to certify which witness my hand and seal of office.

/s/ Sheldon Blair Jackson, III  
Notary Public, State of Texas





**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 18, 2022, a true and correct copy of the foregoing *Respondent/Debtor's Affidavit* was served on the following parties in interest by first class mail and/or ECF notification:

Respectfully Submitted,

LEE LAW FIRM, PLLC

/s/ Christopher M. Lee

Christopher M. Lee

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ATTORNEY FOR DEBTOR

**CHAPTER 13 TRUSTEE**

Tim Truman

8651 NE Loop 820, Ste. 300

N. Richland Hills, TX 76180

**U.S. TRUSTEE**

United States Trustee

1100 Commerce, Room 9C60

Dallas, TX 75242

**DEBTOR**

Christina Adkins

9137 Abaco Way

Fort Worth, TX 76123

**OPPOSING COUNSEL**

Brandy Alexander, Attorney at Law

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